



EI - 8022

Department of Tourism and State Development

MNSDI

July 8, 2008

Ms. Catherine L. Glidden
Section of Environmental Analysis
Surface Transportation Board
395 E Street NW
Washington DC 20423-0001

SECTION 106 PROJECT CONSULTATION – IDENTIFICATION/EVALUATION

Project: 080515042F – Dakota, Minnesota and Eastern Railroad Corporation Powder River Basin Expansion Project – Historic District Treatment Plan; STB Finance Docket No. 33407

Location: Multiple Counties
(STB)

Dear Ms. Glidden:

Thank you for the opportunity to comment on the above referenced project pursuant to Section 106 of the National Historic Preservation Act of 1966 (as amended). On June 25, 2008, the South Dakota Office of the State Historic Preservation Officer (SHPO) received your correspondence and the report entitled "Historic District Treatment Plan for the Dakota, Minnesota & Eastern Railroad Corporation's Powder River Basin Expansion Project," prepared by HDR Engineering. The SHPO has reviewed the information submitted and offers the following comments.

- Throughout Section 4, "Replacement, Rehabilitation, & Repair Guidelines," the report discusses that structures will be evaluated to determine whether they can be rehabilitated for further use or if replacement will be necessary. When will these evaluations take place, and when will this information be conveyed to the SHPO?
- Throughout Section 4, the report notes that when it is "not prudent" to repair and reuse a structure, it will be replaced. What constitutes "not prudent" to repair (e.g. structural issues, funding priorities, etc.)?
- In Section 4.2.4, "Through Riveted Truss," the report notes that "bridges in the District using a through riveted truss over spans in excess of 80-feet were treated as a structural-type category" (page 4-11). Were spans of less than 80 feet considered, and if not, why not?
- In Section 5, "Compensation and Mitigation," the report states: "Representative examples of the various types of contributing elements will be recorded prior to their alteration" (page 5-2). Who chooses the "representative examples"? Will the SHPO be consulted on which "representative examples" will be recorded?

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- Table on pages 5-2 to 5-4
 - This table lists several structures to be recorded. Are these the only structures that will be recorded? If so, how were these structures chosen for recordation?
 - The table notes locations by mileposts, but the report does not include a map indicating the locations of these mileposts. Please provide a map that shows where these structures are located along the DM&E line.
 - What percentage of structures to be recorded is located in South Dakota versus the percentage of structures to be recorded in Minnesota?
- Page 5-4 states: "Property recordation will be completed by DM&E and its representatives and the work will be reviewed by the Minnesota and South Dakota SHPOs. Final approval will be made by the STB." Just to clarify, the South Dakota SHPO would like to review all property recordation prior to any work being undertaken on the structures to ensure that recordation is acceptable.
- Page 5-5 to 5-6 discusses a proposal for DM&E to "provide an undisclosed amount of money towards the renovation and/or upkeep of" the former C&NW passenger depot in De Smet, South Dakota. The report proposes that the funding should be given to the SHPO to administer to the funding recipient to ensure that "the funded work [is] implemented in a historically sensitive manner." The SHPO suggests that a better option is for DM&E to retain and administer the funding after the SHPO reviews project plans for the renovation of the depot, rather than have the SHPO administer the funding.
- How have STB and DM&E taken into account historic properties that are not directly impacted by the project but may be affected by visual, atmospheric, or audible elements [see 36 CFR 800.5(a)(2)(v)]? Examples include listed properties such as the Brookings Commercial Historic District (Brookings), the Ingalls House (De Smet), or the Pyle House (Huron). The only historic properties considered in the report are those directly affected by the project, such as bridges on the railroad line; historic properties outside the area of direct effects do not appear to have been considered.

Thank you for the opportunity to review this report. Should you require additional information, please contact Kate Nelson at (605) 773-6005. Your concern for the non-renewable cultural heritage of our state is appreciated.

Sincerely,

Jay D. Vogt
State Historic Preservation Officer



Kate Nelson
Restoration Specialist